



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1445 ROSS AVENUE
DALLAS, TEXAS 75202-2733

FEB 05 2019

Ms. Laurie Fleet, Section Manager
Wastewater Permitting Section (MC-148)
Texas Commission on Environmental Quality (TCEQ)
P.O. Box 13087
Austin, TX 78711-3087

Re: TPDES Permit No. TX0007439 (WQ0000749000)
GB Biosciences, LLC


Dear Ms. Fleet:

Thank you for the opportunity to review the draft permit for GB Biosciences, LLC (TPDES Permit No. TX0007439), which was received by this office on December 17, 2018. The EPA acknowledges that there may be questions surrounding the public water supply exemption cited at 40 CFR §125.91(c) of the Final Phase II 316(b) Rule. At this time, the EPA has no further comments regarding this exemption, and the TCEQ may proceed with the issuance of this permit. We offer the following recommendation below for your consideration:

Effluent limitations for cyanide (free) are established at final outfall 001, with a provision (no. 10 of OTHER REQUIREMENTS) that states "Any analytical method for free cyanide or available cyanide that is approved in 40 CFR 136 may be used." There is an approved EPA analytical test method, cited at 40 CFR §136, for cyanide (free). Therefore, to ensure adequate protection for aquatic life and human health, we recommend permit compliance for cyanide (free) to be demonstrated by using the EPA approved analytical test method for cyanide (free).

If you any questions or concerns, please contact me at (214) 665-7170, or reply directly to Kilty Baskin at (214) 665-7500 (e-mail: baskin.kilty@epa.gov).

Sincerely,


for Stacey B. Dwyer, P.E.
Associate Director
NPDES Permits and TMDLs Branch

cc (electronic): Ms. Karen Holligan
Industrial Permits Team (MC-148)
TCEQ